

Comments on Draft Regulations to DOGGR's UIC Program
(BWH 2-16-16)

General:

1. Existing regulations are already beyond sufficient, and well into superfluously intrusive territory.
2. Most UIC program failures on record can be traced to a failure by DOGGR to adequately enforce existing regulations, or a failure by DOGGR to detect, with the resources and surveillance systems they already possess, a violation of existing regulations. How many of those that don't fall into this category would have been prevented by the proposed changes? I don't know, and I suspect no one else does either. But I suspect that number is close to zero.
3. The proposed modifications represent a severe additional burden on private industry in aid of nothing. It is friction - non technical persons reading this are advised to look up the technical definition of friction. They are an illegal and immoral, "take" of skills and labor for which my industry receives no just compensation.
4. The blatant hypocrisy of a government agency imposing this burden on an industry that receives an order of magnitude *less* compensation per unit for producing the product than the State and Feds *each* get for regulating it is mind shattering. Any DOGGR employee with a scintilla of integrity would immediately resign his post, had they not already been purged from the ranks by years of the Brown stained regime.

1724.6.c

"...Approval of an underground injection project is at the Division's ongoing discretion and a Project Approval Letter is subject to suspension, modification, or rescission by the Division". The Division's proposal to reserve the right to unilaterally modify project provisions, without discussion or negotiation, at any time is immoral and tyrannical.

1724.6.e:

What kind of idiots does the Division think Operators are? We work for Private Industry rather than for the DOGGR; which exerts competitive pressures that assure a level of competence not enjoyed by protected government employees.

1724.7:

I find it ironic that 99% of the data required by this section consists of spoon feeding back to the Division data that is already available in the Division's web site. But I suppose the intent is to ensure that the Operator has actually examined the data, and done an engineering and geological review. One would like to presume the Division would do the same for themselves before issuing a permit.

1724.7.a.1.E.i-ii:

Seems like this should be the Division's job to do before issuing a permit. But the entire thrust of regulations these days seems to be getting private industry to do the Division's job for them.

1724.7.a.1.I.4:

Requiring a SRT of each injection well is horribly wasteful, redundant, expensive and mind-bogglingly stupid. What kind of idiots think up this crap?

1724.7.a.1.I.8:

More CYA BS clearly designed to shield apparatchiks from any responsibility for any problems that might occur, while simultaneously giving them a tool to avoid approving any project they don't like for any reason, or for no reason at all. You miserable punks are stacking the deck as ice-cold in your favor as

you can, without regard for justice, fairness, or due process.

1724.7.a.1.I.8c:

Why is this additional burden necessary? In aid of what, exactly? Division convenience, at the expense of the industry they parasite seems to be the only logical answer.

1724.7.1:

Are you kidding me? A casing diagram, with a flat data set, to the proposed specifications would be so excessively data packed as to be illegible. I'm mildly surprised that you little tyrants didn't dictate what font/size to use, and what color to use to present specific types of information. What Epic Tools you are.

- It is stupid and redundant to require BFW & BUSDW on each diagram. This data is captured ad nauseam elsewhere, and the lazy little scuts reviewing the project could at least bestir themselves to LOOK there for it.
- J, "Method of determining" is odious BS. If the guy reading the schematic doesn't know, he has no business being on the payroll. I didn't spend years mastering my trade to be forced to spoon feed spoiled little apparatchiks.
- N, O, and P are ridiculous. But then this entire document mostly is.
- P.2 & 3? Seriously? Can't wait to see what that's gonna look like!
- I'd LOVE to see one of you Division weenies actually draw a schematic of a deviated, highly remediated well to these specs. Keep track of how many useless hours you spend on it, and then submit it blind to another apparatchik (who doesn't know it was done in-house) and watch him enthusiastically reject it.

1724.7.2:

The price of lab work just went up by an order of magnitude, to no good purpose.

1724.7.3:

This is the most expensive, poorly designed, and inefficient SRT that I've ever encountered. Someone needs to go back to engineering school. All of you need to go back to governance school, where rule one is to not over-regulate and over-specify procedure; doing so stifles operational, technical, and scientific progress and innovation. But hey, maybe that's the point of this steaming mess.

1724.10.j.(1):

"Pressure testing is required even if the well is no longer an active injection well, unless the well is no longer approved for injection and it is producing oil or gas." Why? In aid of what?

1724.10.j.(4):

48 hours? Really? Why not 148 hours? 24 hours not enough anymore? Too many missed hair/nail appointments?

1724.10.1:

Over-the-top unnecessarily restrictive. See comments on 1724.7.3 above, as they also apply here.